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[Additional moving parties and counsel listed on signature pages]

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

**IN RE: TFT-LCD (FLAT PANEL)
ANTITRUST LITIGATION**

Case No. 3:07-md-1827-SI
MDL No. 1827

This Document Relates to:

Case No. 3:11-cv-00058-SI

COSTCO WHOLESALE CORPORATION.

Plaintiff.

V

AU Optronics Corporation et al.

Defendants

**STIPULATION AND [PROPOSED]
ORDER RE: MODIFYING DEADLINE
FOR FILING OF MOTIONS TO
COMPEL**

Honorable Susan Illston

1 Plaintiff and the Stipulating Defendants, through the undersigned counsel, request that
2 the Court enter the following stipulated order.

3 **STIPULATION**

4 WHEREAS discovery closed in this case on December 8, 2011, as set forth in the
5 Stipulation and Order Modifying Pretrial Schedule for “Track One” Direct Action Plaintiff and
6 State Attorney General Actions (Dkt. No. 3110, the “Scheduling Order”) and the parties
7 previously submitted a stipulation to the Court extending the deadline for Defendants to file
8 motions to compel as to certain discovery to January 13, 2012;

9 WHEREAS Costco and the Stipulating Defendants continue to meet and confer
10 concerning various document production issues identified in correspondence sent by Costco’s
11 counsel to Defendants’ counsel dated December 22, 2011 (collectively, “Costco’s Discovery
12 Responses”);

13 WHEREAS Costco and the Stipulating Defendants hope and expect to resolve some or
14 all of the these issues informally, without the need to file motions to compel and seek the
15 Court’s involvement;

16 WHEREAS the current deadline for parties to file motions to compel with respect to
17 Costco’s Discovery Responses or Defendants’ Discovery Responses is January 13, 2011;

18 WHEREAS in an effort to facilitate the informal resolution of any disputes, the parties
19 wish to extend the deadline for the Stipulating Defendants to file any motions to compel with
20 respect to Costco’s Discovery Responses through February 1, 2012;

21 NOW, THEREFORE, the Parties, through their undersigned respective counsel, stipulate
22 and agree as follows:

23 The deadline for the Stipulating Defendants to file any motion to compel with respect to
24 Costco’s Discovery Responses is extended through and including February 1, 2012.

25 **IT IS SO STIPULATED.**

1 Respectfully submitted,

2 Dated: January 13, 2012

3 By: /s/ Cori G. Moore

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9 *Corporation), Chi Mei Optoelectronics USA, Inc.,*
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28 *Attorneys for Defendants Epson Imaging Devices*
29 *Corporation; Epson Electronics America, Inc.*¹

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31 Pursuant to General Order 45, Part X-B, the filer attests that concurrence in the
32 filing of this document has been obtained from the above-referenced counsel.

33
34 **ORDER**

35 Having considered the foregoing stipulation, and good cause appearing,

36 **IT IS SO ORDERED.**

37
38 1/19/12

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40 Date Entered

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44 Honorable Judge Susan Illston

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47 ¹ Signed and stipulated to without any waiver of rights with respect to arbitration.

CERTIFICATE OF SERVICE BY E-MAIL
(Federal Rules of Civil Procedure Rule 5(b))

I declare that I am employed with the law firm of K&L Gates, LLP, whose address is 925 4th Avenue, Suite 2900, Seattle, Washington 98104-1158. I am not a party to the case, and I am over the age of eighteen years.

I further declare that on January 13, 2012, I served a copy of:

**STIPULATION AND [PROPOSED] ORDER RE MODIFYING DEADLINE
FOR FILING OF MOTIONS TO COMPEL**

by electronically mailing a true and correct copy to all parties of record through the CM-ECF system in accordance with Federal Rules of Civil Procedure Rule 5(b).

I declare under penalty of perjury that the above is true and correct.

Executed at Seattle, Washington, this 13th day of January, 2012.

/s/ Christopher M. Wyant
Christopher M. Wyant